

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS, and VERIZON CORPORATE  
SERVICES GROUP, INC.,

Defendants.

CIVIL ACTION NO. 2:23-CV-00352

**JURY TRIAL DEMANDED**

**AGREED MOTION FOR EXTENSION OF TIME TO FILE PROTECTIVE ORDER**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) hereby stipulate and agree, with the Court’s permission, to an extension of time for the Parties to file a Proposed Protective Order from **October 26, 2023** to on or before **November 1, 2023**.

The Parties do not file this Agreed Motion for purposes of delay, but rather to allow the Parties adequate time to further narrow disputes and address the protections afforded by the proposed order.

DATED: October 26, 2023

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*Attorneys for Defendants Cellco Partnership,  
d/b/a Verizon Wireless and Verizon Corporate  
Services Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 26, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Katherine Q. Dominguez  
Katherine Q. Dominguez

**CERTIFICATE OF CONFERENCE**

I hereby certify that, on October 26, 2023, counsel for Verizon conferred with counsel for Plaintiff Headwater Research LLC and that this Agreed Motion is unopposed.

/s/ Katherine Q. Dominguez  
Katherine Q. Dominguez